

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NEW ENGLAND CENTRAL
RAILROAD, INC.,

Plaintiff,

-v.-

Civil Action No. 04-30235-MAP

SPRINGFIELD TERMINAL
RAILWAY COMPANY, et al.,

Defendants.

**UNOPPOSED JOINT MOTION
TO REVISE SCHEDULE**

The plaintiff, New England Central Railroad, Inc. ("NECR"), and the defendants, Springfield Terminal Railway Company and Boston and Maine Corporation (collectively, "Guilford"), jointly move to revise the schedule for this action. There have been a number of unanticipated delays on both sides in the discovery process, and counsel believe that complete and orderly discovery may help the parties narrow the issues for trial and may improve the prospects for settlement.

The Court's scheduling orders of March 17, 2006 [Docket Nos. 34 and 35] set the pretrial conference for February 2, 2007, at 3:00 p.m., and require a number of actions to be taken by counsel at specified times preceding that date. Counsel respectfully request that the date for the pretrial conference (and perforce, the related dates for other actions and filings by the parties) be postponed for three months. No previous request has been made to postpone this date.

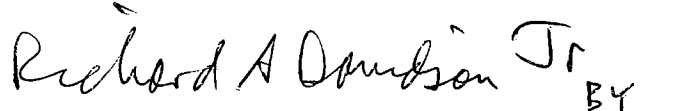
Respectfully submitted,



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November 13, 2006.

Certificate of Service

I hereby certify that the foregoing Unopposed Joint Motion to Revise Schedule will be served electronically on counsel for all parties through the Court's ECF system upon filing with the Court.

A handwritten signature in black ink, appearing to read "Eric L. Hirschhorn", written over a horizontal line.

Eric L. Hirschhorn